

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGHAN MCLOUGHLIN, NY# 5342100
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: (916) 498-5700
Fax: (916) 498-5710

Attorney for Defendant
CHRISTIAN FLORES

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

| | | |
|---------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, |) | Case No. 2:22-CR-00168-JAM-1 |
| |) | |
| Plaintiff, |) | STIPULATION REGARDING EXCLUDABLE |
| |) | TIME PERIODS UNDER SPEEDY TRIAL |
| vs. |) | ACT; ORDER |
| |) | |
| CHRISTIAN FLORES, |) | Date: January 24, 2023 |
| |) | Time: 9:00 a.m. |
| |) | Court: Hon. John A. Mendez |
| Defendant. |) | |

STIPULATION

1. By previous order, this matter was set for a status conference on January 24, 2023.
2. By this stipulation, Defendant Christian Flores now moves to continue the status conference until May 9, 2023, at 9:00 a.m., and to exclude time between January 24, 2023 and May 9, 2023 under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case has been produced to counsel and is preparing to produce supplemental discovery.
 - b) Counsel for defendant desires additional time to review the discovery, consult with her client, conduct defense investigation, discuss potential resolution options, and otherwise prepare for trial.
 - c) Counsel for Mr. Flores believe the failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into

account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and Mr. Flores in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of January 24, 2023 to May 9, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

Dated: January 18, 2023

HEATHER E. WILLIAMS
Federal Defender

/s/ Meghan McLoughlin
MEGHAN MCLOUGHLIN
Assistant Federal Defender
Attorney for Defendant
CHRISTIAN FLORES

Dated: January 18, 2023

/s/ Justin L. Lee
JUSTIN L. LEE
Assistant United States Attorney

ORDER

IT IS SO ORDERED this 18th day of January, 2023.

Dated: January 18, 2023

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE